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DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 6/15/2021

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ONLY

June 14, 2021

Re: United States v. Michael Del Villar et al., 20-cr-295 (VEC)

The Honorable Valerie E. Caproni
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Dear Judge Caproni:

On behalf of the defendant Michael Del Villar, I write respectfully to request permission to redact certain information in a letter request addressed to this Court seeking adjournment of trial (“Adjournment Request”), which contains “sensitive information” as defined in the Southern District of New York Electronic Case and Filing Rules & Instructions (“SDNY Filing Rules”), Section 21 (Privacy and Public Access to ECF Cases) in accordance with Federal Rule of Criminal Procedure 49.1(e)(1) (Privacy Protection for Filings Made with the Court), and other privacy concerns. The Government and counsel for Enrique Rosado consent to this request.

The SDNY Filing Rules specify that medical records, treatment, and diagnosis qualify as “sensitive information” that a filer should consider redacting. SDNY Filing Rules, Section 21.4. Medical information of a third party is included at the following citation and we respectfully request its redaction: Adjournment Request, at 1.

Pursuant to Rules 3 (A) (ii) and (iii) of Your Honor’s Individual Practices in Criminal Cases, we will file the redacted versions of the documents on ECF and email Chambers a copy of the documents with redactions identified.

Thank you for the Court’s consideration of this request. We are available to provide any additional information the Court requires.

CAHILL GORDON & REINDEL LLP

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Respectfully submitted,


/s/ Danielle Simard
Danielle Simard

Counsel for Michael Del Villar

cc: Brett Kalikow, Assistant United States Attorney (via ECF)
Toni Messina, Esq. (via ECF)

Application GRANTED.

SO ORDERED.

 6/15/2021

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE